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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CARRIE HARADA, an individual,

Plaintiff,

vs.

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY, a foreign
corporation; DOES I through X, inclusive;
and ROE BUSINESS ENTITIES I through
X, inclusive,

Defendants.

Case Number
2:24-cv-00559-GMN-EJY

**JOINT STIPULATED DISCOVERY
PLAN AND SCHEDULING ORDER**

**SPECIAL SCHEDULING REVIEW
REQUESTED**

JOINT STIPULATED DISCOVERY PLAN AND SCHEDULING ORDER

All parties of record participated in the meeting required under Fed. R. Civ. P. 26(f), which was held on **April 24, 2024**. Pursuant to Fed. R. Civ. P. 26(f) and LR 26-1, the parties hereby submit the following Discovery Plan and Scheduling Order.

1. **Discovery Cut-Off Date.** Defendant State Farm Mutual Automobile Insurance Company will file his answer to Plaintiff's Complaint on **May 6, 2024**. This case involves a breach of contract and breach of the implied covenant of good faith and fair

1 dealing. The parties will likely require both medical and claims handling experts. The claims
2 handling experts will need to rely on the medical expert reports, which makes completing
3 discovery in the normal 180-day period extremely difficult, if not impossible. The parties
4 therefore an extended discovery period of two hundred and forty (240) days from **May 6,**
5 **2024**. The discovery period, therefore, will close on **Thursday, January 2, 2025** (January
6 1, 2025 falls on a federal holiday).

7 2. **Amending the Pleadings and Adding Parties.** The date for filing motions
8 to amend the pleadings or to add parties shall be no later than ninety (90) days prior to the
9 close of discovery, which is **Friday, October 4, 2024**.

10 3. **Expert Witness Disclosures.** The disclosure of any expert witnesses shall
11 be made sixty (60) days before the discovery cut-off date, which is **Monday, November 4,**
12 **2024** (November 3, 2024 falls on a Sunday). The disclosures of any rebuttal experts shall be
13 due 30 days after the initial disclosures of experts, which is **Wednesday, December 4, 2024**.
14 The requirements of Fed. R. Civ. P. 26(a)(2)(B) shall apply to any such disclosures.

15 4. **Dispositive Motions.** Dispositive motions shall be filed no later than thirty
16 (30) days after the discovery cut-off date, which is **Monday, February 3, 2025** (February 1,
17 2025 falls on a Saturday).

18 5. **Pre-Trial Order.** The Joint Pre-Trial Order shall be filed no later than thirty
19 (30) days after the date set for filing dispositive motions, which is **Wednesday, March 5,**
20 **2025**. However, in the event that dispositive motions are filed, the date for filing the Joint
21 Pre-Trial Order shall be suspended until thirty (30) days after a decision on the dispositive
22 motion(s) or further order of the Court. The disclosures required by Fed. R. Civ. P. 26(a)(3)
23 and any objection thereto shall be included in the Pre-Trial Order.
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6. **Initial Disclosures.** The parties shall make their Initial Disclosures on or before **Monday, June 10, 2024**, as required by Fed. R. Civ. P. 26(a)(1)(A). No changes in the form or requirements for such disclosures are necessary.

7. **Discovery Subjects.** Discovery is permitted to the extent provided under the FRCP and the Local Rules, subject to any stipulated protective orders or electronic discovery protocols as entered in the case. Discovery does not need to be conducted in phases, limited, nor focused on particular issues.

8. **Electronically Stored Information (“ESI”).** The parties anticipate that they will be presenting evidence in an electronic format to jurors for the purposes of jury deliberations. The parties certify they have discussed whether they intend to present evidence in electronic format to jurors for the purpose of jury deliberations, but no stipulations have been reached at this time regarding providing discovery in an electronic format compatible with the Court’s electronic jury evidence display system.

9. **Protection of Privileged/trial Preparation Material.** The parties prefer to handle these questions on an ad hoc basis as issues arrives, but the provisions of Fed. R. Civ. P. 26(b)(5)(B) shall apply.

10. **ADR Processes.** The parties certify that they met and conferred about the possibility of using alternative dispute-resolution processes in compliance with LR 26-1(b)(7).

11. **Alternative Forms of Case Disposition.** The parties have conferred about the possibility of using alternative dispute resolution processes, however, the parties currently have not utilized any form of alternative dispute resolution.

12. **Alternative Form of Case Disposition:** Pursuant to LR 26-1(b)(8), the

1 parties certify that they met and conferred, and considered consent to trial by judge under
2 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program, and do
3 not consent thereto.

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14 **IT IS SO ORDERED.**

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16 UNITED STATES MAGISTRATE JUDGE

17 Dated: May 7, 2024
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